

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS  
LIABILITY LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*The Estate of Robert Lee v. Zhejiang Huahai  
Pharmaceutical Co., Ltd., et al.*

Case No. 1:20-cv-15324

**AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF  
PETER PARTEE, M.D.**

**PLEASE TAKE NOTICE** that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 – document 632), Plaintiff Debra Lee, as Personal Representative and Spouse of Robert Lee (Deceased), will take the deposition upon oral examination of Peter Partee, M.D. on **October 22, 2021 at 1:00 pm EST**, and continuing until completion, via remote deposition (Zoom) while the witness is at his home or office or other location agreed to by the parties. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically via Zoom, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The court reporter and videographer will be an employee or agent of Golkow Global Litigation Services.

The attorney contact for the deposition is:

Sara T. Papantonio  
LEVIN, PAPANTONIO, RAFFERTY,  
PROCTOR, BUCHANAN, O'BRIEN,  
BARR & MOUGEY, P.A.  
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Dated: October 20, 2021

Respectfully submitted:

/s/Sara T. Papantonio  
Sara T. Papantonio  
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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>th</sup> day of October, 2021, I caused a true and correct copy of the foregoing Amended Notice of Videotaped Deposition of Peter Partee, M.D., to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was served on the following Defendants' counsel by e-mail:

Tori Langton (via email, for distribution to Defendants' Counsel)

Golkow Global Litigation Services (via email)

/s/Sara T. Papantonio

Sara T. Papantonio

**Levin, Papantonio, Rafferty, Proctor,  
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